

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**X CORP.**, a Nevada corporation,

Plaintiff,

vs.

**MEDIA MATTERS FOR AMERICA**, a  
Washington, D.C. non-profit corporation,  
**ERIC HANANOKI**, and **ANGELO  
CARUSONE**,

Defendants.

**Case No. 4:23-cv-01175-O**

**MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Plaintiff X Corp. (“X”) brings this motion to compel against Defendants Media Matters for America, Eric Hanonoki, and Angelo Carusone. For the reasons stated in the accompanying brief in support, X requests that the Court issue an order overruling Defendants’ objections to X’s Request for Production Nos. 108, 113, and 114, and requiring Defendants to promptly provide all responsive documents.

Dated: April 14, 2025

Respectfully submitted,

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### **CERTIFICATE OF CONFERENCE**

I certify that counsel for the parties met and conferred over these Requests for Production multiple times via both email and phone conference beginning on January 8, 2025. Counsel most recently conferred via video conference on April 7 and confirmed that they were at an impasse on RFPs 113 and 114. Defendants' counsel, for the first time, stated that they might reconsider their position with respect to RFP 108, despite having steadfastly maintained their objections for months. Nevertheless, a full week elapsed without a response from Defendants and Plaintiff sent a follow up email on April 14, 2025. Although Defendants ambiguously replied that they would amend their response to RFP 108, Defendants did not agree to withdraw their objections and produce all responsive documents, necessitating this motion.

/s/ Alexander M. Dvorscak  
Alexander M. Dvorscak

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2025, a copy of this document was served on all counsel of record through the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Alexander M. Dvorscak  
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